

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**B.P., et al.,**

**Plaintiffs,**

**v.**

**No: 2:23-cv-00071-TRM-JEM**

**CITY OF JOHNSON CITY, TENNESSEE, et al.,**

**Defendants.**

**AMENDED STIPULATION AND [PROPOSED] ORDER CONTINUING DEADLINES  
TO FILE (1) REPLY IN SUPPORT OF MOTION FOR LEAVE TO FILE THIRD  
AMENDED COMPLAINT (ECF 419); (2) CITY’S RESPONSES TO PLAINTIFFS’  
SIXTH SET OF INTERROGATORIES AND TWELFTH SET OF REQUESTS FOR  
PRODUCTION; AND (3) PLAINTIFFS’ OPPOSITION TO, AND SPARKS’ REPLY IN  
SUPPORT OF, SPARKS’ MOTION FOR PROTECTIVE ORDER (ECF 469)**

Plaintiffs, B.P., H.A., and S.H., individually and on behalf of all others similarly situated, and Defendant City of Johnson City, Tennessee, Karl Turner, Toma Sparks, and Jeff Legault in their individual capacities, and non-Party Kevin Peters and non-Party Justin Jenkins in their individual capacities, by and through their respective counsel of record, hereby enter into the stipulation below with reference to the following facts:

WHEREAS, Plaintiffs are currently scheduled to file their Reply in support of their Motion for Leave to File Third Amended Complaint (ECF 419) (“Reply”) on December 23, 2024;

WHEREAS, the City of Johnson City is currently scheduled to file its Responses to Plaintiffs’ Sixth Set of Interrogatories and Twelfth Set of Requests for Production (“Discovery Responses”) on December 27, 2024;

WHEREAS, Plaintiffs are currently scheduled to file their Opposition to Sparks' Motion for Protective Order and/or Motion to Quash (ECF 469) on December 20, 2024, and Sparks is scheduled to file his Reply on December 27, 2024;

WHEREAS, due to ongoing settlement negotiations, the upcoming holiday, and counsels' travel schedules this month, the above Parties agree to extend all deadlines; and

THEREFORE, the above Parties, by and through their undersigned counsel of record, hereby STIPULATE and request the Court enter an order:

1. Extending Plaintiffs' deadline to file their Reply in support of their Motion for Leave to File Third Amended Complaint until January 6, 2025.
2. Extending the City's deadline to respond to Plaintiffs' Sixth Set of Interrogatories and Twelfth Set of Requests for Production until January 10, 2025.
3. Extending Plaintiffs' deadline to file their Opposition to Sparks' Motion for Protective Order and/or Motion to Quash (ECF 469) until January 10, 2025, and extending Sparks' deadline to file his Reply in support of his motion to January 17, 2025.

IT IS SO STIPULATED.

Dated December 20, 2024.

Respectfully submitted,

/s/ Julie C. Erickson

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*Counsel for Karl Turner in his individual capacity and  
Non-Party Kevin Peters in his individual Capacity*

**[PROPOSED] ORDER**

Pursuant to the foregoing Stipulation and for the good cause shown, it is hereby

ORDERED:

1. Plaintiffs' deadline to file their Reply in support of their Motion for Leave to File Third Amended Complaint is extended until January 6, 2025.
2. The City's deadline to respond to Plaintiffs' Sixth Set of Interrogatories and Twelfth Set of Requests for Production is extended until January 10, 2025.
3. Plaintiffs' deadline to file their Opposition to Sparks' Motion for Protective Order and/or Motion to Quash (ECF 469) is extended until January 10, 2025, and Sparks' deadline to file his Reply in support of his motion is extended to January 17, 2025.

IT IS SO ORDERED.

Date: \_\_\_\_\_

By: \_\_\_\_\_  
The Honorable Travis R. McDonough

## CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been filed and served via the court's electronic filing system on December 20, 2024 to counsel of record:

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/s/ Julie C. Erickson  
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